

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Located in Baltimore

IN RE

RICHARD LESTER MILLER
HELEN REBECCA MILLER

Debtor

Case No. 17-16916-NVA
Chapter 13

QUICKEN LOANS INC.

Movant

v.

RICHARD LESTER MILLER
HELEN REBECCA MILLER

Respondents

Motion No.

**MOTION FOR AUTHORITY TO MODIFY THE TERMS OF AN EXISTING SECURED
LOAN FOR REAL PROPERTY AND NOTICE OF OPPORTUNITY TO OBJECT**

Quicken Loans Inc. hereby seek Court authority to modify the terms of an existing secured loan for real property, and submits the following information regarding the modified loan:

1. The address of the real property is 115 N Main Street, Union Bridge, MD 21791 with a legal description of Land Situated in the County of Carroll in the State of MD All that lot or parcel of land situate, lying and being in the Twelfth Election District of Carroll County, Maryland, containing 12,000 square feet of land, more or less, and being knwn and designated as Lot No. 3, Block B, as shown on a Plat entitled "Clemson Heights Addition to Union Bridge", which Plat is recorded among the Land Records of Carroll County in Liber No. 142, folio 154&c. The property address and tax parcel identification number listed are provided soleley for informational purposes. Commonly known as: 115 N Main St, Union Bridge, MD 21791-9101.
2. The holder of the secured claim is Quicken Loans Inc..
3. The amount of the proposed modified secured claim is \$195,983.47.

This amount does ___x___ or does not ____ (check one) include pre-petition arrears currently being paid through the plan.
4. The monthly amount of the modified secured claim payments are:

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MD BAR 15070
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4340 East West Highway
SUITE 600
BETHESDA, MD 20814
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\$907.63 plus escrow beginning 01-Sep-18 at an interest rate of 3.750% , continuing thereafter until the maturity date of August 1, 2048.

6. The loan modification does x or does not (check one) affect the terms of the confirmed plan in the case. If the loan modification does affect the terms of the confirmed plan in the case, the Debtor(s) will have to separately file a motion to modify the confirmed plan. This motion does not constitute a motion to modify the confirmed plan.
7. The loan modification will not alter or affect the status or priority of any other existing lien(s) on the real property.
8. The holder of the modified secured claim will file an amended proof of claim or withdraw the filed proof of claim upon Court approval of the loan modification and closing of the loan modification documentation.

WHEREFORE, Quicken Loans Inc. submits this motion to modify the terms of an existing secured loan for real property and for any other relief the Court deems necessary.

Date: August 20, 2018

Respectfully submitted

ROSENBERG AND ASSOCIATES, LLC

/s/ Mark D. Meyer, Esq.

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**NOTICE OF OPPORTUNITY TO REQUEST A HEARING TO CREDITORS AND
PARTIES IN INTEREST**

You are notified of the filing of the foregoing Motion requesting Court authority to modify the terms of an existing secured loan for real property. Any interested party objecting to the loan modification must file an objection with the United States Bankruptcy Court for the District of Maryland within twenty-one (21) days after the date of this motion. You are further notified that unless an objection is filed, the Court may grant the motion without a hearing.

CERTIFICATE OF SERVICE

I hereby certify that this Motion for Approval of Loan Modification was served this 20th day of August, 2018 electronically to those recipients authorized to receive a Notice of Electronic Filing by the Court, and/or by first class mail, postage prepaid to:

Richard Lester Miller (via ECF)
115 North Main Street
Union Bridge, MD 21791

Helen Rebecca Miller
115 North Main Street
Union Bridge, MD 21791

Jobeth Rocky Bowers, Esquire (via ECF)
Bowers Law, LLC
224 E. Main St
Elkton, MD 21921

Robert S. Thomas, II
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/s/ Mark D. Meyer, Esq.
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